

In re:	:	CHAPTER 13
	:	JUDGE: JJT
Patricia Bermudez	:	
Debtor	:	
	:	
Patricia Bermudez	:	
Movant	:	
	:	
v	:	Bankruptcy No.5:16-04514 (JJT)
	:	
Charles DeHart	:	
Chapter 13 Trustee	:	
Respondent	:	
	:	
	:	

Movant, by its attorney, Stuart D. Gavzy, Esquire, hereby requests approval for Wrongful Termination Settlement Agreement.

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4. One of the assets in this case was claim against a former employer and prosecuting this case, under Order of Retention to be entered by this Court, is Jeremy Cerruti, Esq., of the law firm of Karpf, Karpf & Cerruti.
5. This lawsuit has been settled for the sum of \$85,000.00, to be allocated between the Debtor and special counsel, Jeremy Cerruti, Esquire as follows: \$50,346.65 to the Debtor and \$34,653.35 to counsel.
6. The factual statements set forth in this Motion have been made based on a personal review by me and staff to the list of insiders and creditors of the Debtor. This effort did not reveal any conflicts.

WHEREFORE, Movant respectfully requests that this court enter an
Order:

- a. Granting the Settlement of the Debtors Wrongful Termination Lawsuit.
- b. Any non-exempt proceeds be turned over to the Trustee for disbursement to the Unsecured Creditors
- c. Granting any other relief that this Court deems equitable and just.

Dated: July 21, 2017,

/s/Stuart D. Gavzy, Esquire
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